

December 8, 2008

Ms. Laura E. Sinram
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C0075820) is in receipt of your Request for Additional Information dated November 5, 2008 regarding our September 2008 monthly FEC report.

The primary debt donation to Blaine for Congress was made on August 12, 2008. This campaign filed its October 2008 quarterly report reflecting substantial outstanding debt on September 30, 2008 following the primary election in Missouri. Therefore, this was a permissible donation.

The primary debt donation to Lummis for Congress was made on August 22, 2008. This campaign filed its October 2008 quarterly report reflecting substantial outstanding debt on September 30, 2008 following the primary election in Wyoming. Therefore, this was a permissible donation.

The primary debt donation to Lynn Jenkins for Congress was made on August 6, 2008. This campaign filed its October 2008 quarterly report reflecting substantial outstanding debt on September 30, 2008 following the primary election in Kansas. Therefore, this was a permissible donation.

The primary debt donation to Tom Rooney for Congress was made on August 29, 2008. This campaign filed its October 2008 quarterly report reflecting substantial outstanding debt on September 30, 2008 following the primary election in Florida. Therefore, this was a permissible donation.

The National Republican Congressional Committee was authorized to make coordinated expenditures on behalf of Jay K. Love by both the Republican National Committee and the Alabama Republican Party; on behalf of Christopher J. Lee by both the Republican National Committee and the New York Republican Federal Campaign Committee; on behalf of Lou Barletta by both the Republican National Committee and the Ohio Republican Party State Central Committee; and on behalf of Representative Dave Reichert by both the Republican National Committee and the Washington State Republican Party. Therefore, there are no excessive coordinated expenditures. However, the FEC's electronic filing software permits only one authorizing committee to be listed.

The line 15 receipts referenced in your letter from Barrett for Congress, Bilirakis for Congress, Cathy McMorris for Congress, Citizens for Andal, Friends for Sam Johnson, Graves for Congress, Jim Gerlach for Congress, Jordan for Congress, Kay Granger Campaign Fund, Latta for Congress, Lee Terry for Congress, McHenry for Congress, People With Hart, Tim Murphy for Congress, and Tom Feeney for Congress result not from expenditures to these entities, but from payments made to Whitaker Askew, John DeStefano, and Kevin McGrann.

The line 15 receipts from Judy Allred and from 3 Dog Consulting, LLC represent COBRA reimbursements for payments made to Mamsi Life and Health. The receipts from Every Republican is Crucial PAC and from For Americas Republican Majority PAC represent telephone reimbursements from payment made to Verizon.

The Committee has as you indicated reviewed all reimbursements to individuals for travel and subsistence, and reviewed the reporting requirements outlined in the regulation you cited at 11 CFR 104.9. The Committee has also

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reviewed the Commission's policy statement regarding purpose of disbursement entries as published in the Federal Register on January 9, 2007. Through this response the Committee can as you requested confirm that no further itemization is required under any Commission regulation for these expenditures.

The Committee reported on Schedule E a disbursement to Scott Howell and Company LP on 8/13/08. One 8/18, that expenditure qualified by date of dissemination as an independent expenditure, and the required 48-hour notice was filed on 8/18. Therefore, no amendment is necessary with respect to this expenditure.

The payments referenced in your letter for 'Catering', 'Facility Rental", Facility Rental/Catering", 'Fundraising Phone Calls', 'Media Consulting', "Photographs", "Photography Svc", 'Postage', and 'Printing' were operating and administrative payments solely benefitting and on behalf of the National Republican Congressional Committee. As such, they were not made on behalf of any specifically identified federal candidates, nor did they constitute public communications or voter drive activity containing express advocacy. Therefore, these disbursements are as you noted correctly reported on Schedule B for Line 21b, and do not require a Schedule B, Schedule E, or Schedule F for lines 23, 24 or 25.

The Committee has as of this date amended its Form 1 to list the McKeon-California Victory Committee as a joint fundraising representative.

Sincerely:

Keith A. Davis, Treasurer
National Republican Congressional Committee
